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8 UNITED STATES DISTRICT COURT
9 CENTRAL DISTRICT OF CALIFORNIA

10 ILIANA FISCHER

CASE NUMBER:

11 Case No. 2:22CV08019 JFW PVCx

12 Plaintiff

Honorable John F. Walter

13 ANGELA WHITE

FIRST AMENDED COMPLAINT FOR

14 Defendant(s).

COPYRIGHT INFRINGEMENT

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16 **I. NATURE OF THE ACTION**

17 This is an action for copyright infringement under the Copyright Act of 1976, 17 U.S.C. § 101 et seq.

18 Plaintiff Iliana Fischer seeks damages and injunctive relief against Defendant Angela White pka Blac Chyna
19 for the unauthorized copying and exploitation of Plaintiff's original song 'Hate Me Too.' Defendant's song
20 'Doom' copies original elements of Plaintiff's song, including the central lyrical hook, cadence, and
21 performance style.

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23 **II. JURISDICTION AND VENUE**

24 This Court has subject matter jurisdiction over this action pursuant to 28 U.S.C. §§ 1331 and 1338(a),
25 as this action arises under the Copyright Act, 17 U.S.C. § 501.

26 Venue is proper in this District pursuant to 28 U.S.C. §§ 1331 and 1338(a) because Defendant resides
27 in this District, and a substantial part of the events giving rise to the claim occurred in this District.

III. PARTIES

Plaintiff Iliana Fischer is an individual residing in California and the creator and copyright owner of the musical work 'Hate Me Too.'

Defendant Angela White, professionally known as Blac Chyna, is an individual who, upon information and belief, resides in this District. Defendant released and distributed the infringing musical work 'Doom'

III. FACTUAL ALLEGATIONS

Plaintiff created and recorded the song 'Hate Me Too' in or about 2015. Plaintiff's work is original and contains protectable elements, including the refrain and lyrical hook 'If I were you, I would hate me too,' repeated four times as the song's central feature, combined with distinctive cadence, arrangement, and performance.

Plaintiff registered the song 'Hate Me Too' with the United States Copyright Office (Registration No. SR 951-238 and PA 2-417-217) demonstrating ownership of the copyright.

Plaintiff entered into a distribution agreement with Sony Music, further evidencing the commercial exploitation of her work.

Plaintiff publicly uploaded 'Hate Me Too' to SoundCloud, where it was accessible to the public and to Defendant prior to Defendant's release of 'Doom.'

On information and belief, Defendant's collaborator followed Plaintiff's co-performer on Instagram, further supporting that Defendant had access to Plaintiff's song

IV. CLAIM FOR RELIEF

COUNT I – COPYRIGHT INFRINGEMENT (17 U.S.C. § 501)

Plaintiff incorporates by reference the allegations in paragraphs 1-13.

Plaintiff is the owner of a valid copyright in the song 'Hate Me Too.'

Defendant had access to Plaintiff's work and copied original and pro

Defendant's conduct constitutes copyright infringement in violation of 17 U.S.C. § 501.

As a direct and proximate result of Defendant's infringement, Plaintiff has suffered actual

entitled to Defendant's profits attributable to the infringement, in an amount to be proven at trial.

Defendant's infringement was willful, entitling Plaintiff to enhanced damages under 17 U.S.C. § 504(c).

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D. IN THE ALTERNATIVE, LEAVE TO AMEND IS REQUIRED

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Even if the Court finds deficiencies in the Complaint, dismissal with prejudice would be improper.
3 Plaintiffs must be granted leave to amend unless amendment would be futile. See *Lopez v. Smith*,
4 203 F.3d 1122, 1130 (9th Cir. 2000). Here, Plaintiff could add further factual detail regarding her copyright
5 copyright registration, Sony distribution agreement, timeline of publication, and additional evidence of
6 Defendant's access. At minimum, leave to amend is required.

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III. CONCLUSION

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For the foregoing reasons, Plaintiff respectfully requests that the Court deny Defendant's Motion for
9 Judgment on the Pleadings. In the alternative, Plaintiff requests leave to amend her Complaint.

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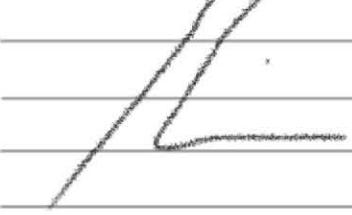
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Dated: September 11, 2025

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By: Iliana Fischer - pro per

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